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20 **UNITED STATES DISTRICT COURT**  
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 OWEN DIAZ,  
23 Plaintiff,  
24 v.  
25 TESLA, INC. DBA TESLA MOTORS, INC.,  
26 Defendant.

Case No. 3:17-cv-06748-WHO

**PLAINTIFF'S OBJECTIONS TO  
DEFENDANT'S DESIGNATIONS OF  
DEMETRIC DI-AZ'S DEPOSITION  
TESTIMONY**

Trial Date: March 27, 2023  
Complaint Filed: October 16, 2017

**DEFENDANT'S DESIGNATIONS OF DEMETRIC DI-AZ'S DEPOSITION TESTIMONY**

Defendant respectfully submits the following chart identifying deposition testimony designated for the above referenced witness:

#	Lines	Deposition Excerpt	Objection/Counterdesignation
1	40:12-13	10 Q. Take your time to read Exhibit 6. It's a 11 document marked at the bottom as Tesla 156. 12 Is this a copy of your resume? 13 A. Yes.	Objection: Relevance; FRE 403
2	40:23 – 41:3	23 Q. Did you submit this as part of your application 14 to work at West Valley in or around August of 2015? 25 A. Yes. 1 Q. Did you submit this as part of your application 2 to work at Tesla in or around August of 2015? 3 A. Yes.	Objection: Relevance; FRE 403
3	150:15-151:20	<b>150:</b> 15 Q. In paragraph 14 you state "In approximately 16 August of 2015, Demetric's father, Owen, informed him 17 West Valley had openings for positions at the Tesla 18 factory." 19 Did your father tell you that West Valley had 20 openings? 21 A. Yes. 22 Q. Did your father encourage you to apply? 23 A. Yes. 24 Q. What did your father tell you about what it was 25 like to work at Tesla? <b>151:</b> 1 A. He told me it was going to be a good experience 2 and that it would be -- like, it would be good. I 3 bought into it because I thought it was going to be the	

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		<p>4 ultimate experience. Like, oh, I get to work for Tesla.</p> <p>5 They're making modern productions to build electrical</p> <p>6 cars to make the world a better place. Like, why</p> <p>7 wouldn't I want to be a part of that?</p> <p>8 Q. Your father told you it was going to be a good</p> <p>9 experience to work at Tesla?</p> <p>10 A. Yeah. He told me it would be a good experience</p> <p>11 and it was going to be good for me.</p> <p>12 Q. And that was right before you applied in August</p> <p>13 of 2015?</p> <p>14 A. Yes.</p> <p>15 Q. Did your father tell you around the time you</p> <p>16 applied in August 2015 anything about what his work</p> <p>17 experience was like at Tesla?</p> <p>18 A. When I was applying there, he said that his work</p> <p>19 experience was going okay. From what I could tell, it</p> <p>20 was going good.</p>	
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Dated: February 13, 2023

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/s/ Lawrence A. Organ

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